

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 22-CR-20104-JEM(s)(s)(s)(s)

UNITED STATES OF AMERICA

vs.

GERMAN ALEJANDRO RIVERA GARCIA,

Defendant.

STIPULATED FACTUAL PROFFER IN SUPPORT OF PLEA

If this matter were to proceed to trial, the Government would prove the following facts beyond a reasonable doubt. The Parties agree that these facts, which do not include all facts known to the Government and the Defendant, **GERMAN ALEJANDRO RIVERA GARCIA** (“RIVERA”), are sufficient to prove the guilt of the Defendant as to Counts One, Two and Three of the Fourth Superseding Indictment:

Starting in approximately February 2021, RIVERA conspired to provide and provided material support and resources, specifically personnel (including himself) and services, knowing and intending that the material support and resources would be used to prepare for and carry out the forcible removal of Haitian President Jovenel Moise by kidnapping and/or assassination (the “operation”), and the death of President Jovenel Moise resulted from the operation. RIVERA provided training, advice, and assistance, including with respect to operational planning to facilitate the operation.

RIVERA participated in various meetings with co-conspirators to discuss the operation in the Southern District of Florida (which RIVERA attended via audio or video teleconference) and in Haiti (which RIVERA attended in person). At such meetings, conspirators discussed proposed methods for carrying out the operation and the need to acquire weapons to facilitate the operation. The meetings held in the Southern District of Florida were attended by several co-conspirators, including Arcangel Pretel Ortiz (“Ortiz”), Antonio Intriago (“Intriago”), James Solages (“Solages”), Christian Sanon (“Sanon”), and Walter Veintemilla (“Veintemilla”), and others. RIVERA also personally attended operational meetings in Haiti, which were attended by co-conspirators, including Intriago, Solages, Sanon, Joseph Vincent (“Vincent”), Mario Antonio Palacios Palacios (“Palacios”), Rodolphe Jaar (“Jaar”), Joseph Joel John (“John”), and others.

RIVERA was present at meetings where the assassination of President Moise was discussed. One such meeting, which was attended by RIVERA, Solages, John and Vincent, among others, occurred approximately two weeks prior to the assassination. At the commencement of that meeting, Ortiz, via video call, directed RIVERA to follow the instructions of a co-conspirator who was present at the meeting. That co-conspirator then told RIVERA and another co-conspirator that the President would be assassinated as part of the operation. RIVERA and Solages then relayed that information to other members of the conspiracy, including Vincent and Palacios. Approximately four to five days prior to the assassination, Solages and RIVERA again communicated to members of the conspiracy, including Palacios and Vincent, that the operation would result in the assassination of President Moise. On July 7, 2021, RIVERA and his co-conspirators set out in a convoy towards the President’s residence. RIVERA’s co-conspirators

entered the presidential residence in Haiti with the intent and purpose of killing President Moise, and in fact, the President was killed.

The aforementioned criminal acts were calculated to influence and affect the conduct of the Haitian government by intimidation and coercion, and RIVERA intended to do so.

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

Date: 9/7/23 By:


MONICA K. CASTRO
ASSISTANT U.S. ATTORNEY

Date: 9/7/23 By:


MARK LEVINE, ESQ.
ATTORNEY FOR DEFENDANT

Date: 9/7/23 By:


GERMAN ALEJANDRO RIVERA GARCIA
DEFENDANT